

**REMARKS/ARGUMENTS**

Applicants appreciate the Examiner's thorough search with respect to the present patent application. Applicants note with appreciation the Examiner's indication that the rejection under 35 U.S.C. §112 cited in the previous Office Action has been withdrawn.

Claims 1 - 16 and 19 have been amended to more particularly define applicants' invention. Applicants believe the amendments to these claims make explicit that which was already implicit, and accordingly, are not made for purposes required for patentability.

Claims 1-19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Rudt (U.S. Patent No. 5,717,456) in view of Katz (U.S. Patent No. 5,956,081). The Examiner asserts that the combination of Rudt and Katz shows all of the elements of these claims, including the independent claims. The Examiner explicitly states that Rudt does not disclose displaying a selection area on the operator's computer screen that represents images in a sequence of images. However, the Examiner asserts Katz teaches the use of a user interface that comprises a selection area that represents images in a sequence of images. Therefore, the Examiner concludes it would have been obvious to one of ordinary skill in the art to take the teachings of Rudt and Katz as a whole for implementing applicants' invention. Applicants respectfully disagree.

Independent claims 1 and 2, as amended, define a method for "synchronizing image data from images of a web obtained from a plurality of cameras." Each of the cameras is placed in a position to take a respective image and images are taken "using at least some of the cameras." Image data (2d<sub>1</sub> - 2d<sub>n</sub>) from the images are stored in "at least one digital image processor." Further, claims 1 and 2 recite "defining at least one parameter representing at least one characteristic of the web," and "selecting at least some images of an area of the web and taken from a first of [the] plurality of cameras" for display on a computer screen. Moreover, the "at least one parameter" is used by a "synchronization means" to search the image data for images taken from at least a second of the "at least some of the cameras" that depict the same area in the web. A "selection area" 10 uses the at least one parameter to display "fewer than all images .. from one of the at least some of the plurality of cameras."

Applicants respectfully submit that, unlike applicant's claims 1 and 2, Rudt is directed to image synchronization in order to identify and display image "clips" (camera views) from a plurality of camera positions. Rudt does not teach or suggest a synchronization means that uses at least one parameter to search for particular images taken from at least a second of at least some cameras, nor does Rudt teach or suggest displaying a selection area on a computer screen that corresponds to fewer than all images taken from one of the plurality of cameras.

Applicants further submit that the teachings of Katz do not supply the missing elements from applicants' claims 1 and 2. Katz teaches the use of a plurality of cameras, and a selection of a desired camera view while simultaneously displaying views from related cameras (see column 4, lines 49-67). Applicants respectfully submit that the selection of a single camera view and automatic display of related camera views, as provided by Katz, differs significantly from the "synchronization means" that uses "at least one parameter" as recited in applicants' claims 1 and 2. Further, Katz teaches a selection of a single camera view that displays a continuous video signal that comprises *all* of the images taken at the time by the respective camera, which differs from the "selection area" of applicants' claims 1 and 2 that represents *fewer than all* images from a single camera.

Therefore, applicants respectfully submit that Katz does not supply the elements of independent claims 1 and 2 that are missing from the teachings of Rudt. Even assuming, *arguendo*, that one were to combine the teachings of Rudt and Katz, applicants' claims 1 and 2 are not taught because the resulting selection area would represent the continuous image clips of Rudt and a plurality of clips from related cameras that are simultaneously displayed. Applicants maintain that the combined teachings of Rudt and Katz do not teach or suggest the "synchronization means" and "selection area" as defined in applicants' claims 1 and 2.

Independent claim 19 is patentable over the combined teachings of Rudt and Katz for the same reasons. A synchronization means using at least one parameter to search for images taken by one camera that depict an area of a web displayed in images taken by a different camera is not taught or suggested by the combined teachings of Rudt and Katz. Further, applicants' selection area that represents fewer than all images in a sequence of images from one of a plurality of cameras is also not taught or suggested by the combined teachings of Rudt and Katz.

Claims 3-18 depend directly or indirectly from independent claim 1 or claim 2, and, therefore, are patentable for the same reasons as well as because of the combination of features set forth in those claims with the claim(s) from which they depend.

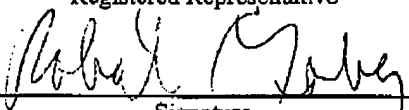
This application is believed to be in condition for allowance, which action is earnestly solicited.

I hereby certify that this correspondence is being facsimile transmitted to the Patent and Trademark Office, on January 7, 2004:

Respectfully submitted,

Robert C. Faber

Name of applicant, assignee or  
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Signature

January 7, 2004

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